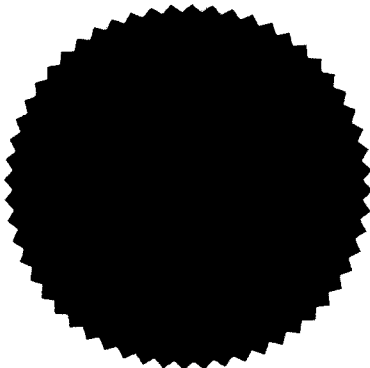


This is to certify that the attached document is a true photocopy of the original



I want to add a few points to my detailed affidavit drawn up in connection with the lawsuit instituted by Eridan Shipping. Ltd., Kama II Shipping Co. Ltd., Antarus Shipping Co. Ltd., Ferrum Shipping Co. Ltd.¹ and Kama River Shipping of Perm, Russia against Stanislav Filatov, Irina Filatova, Vadim Voronine, Anna Filatova, Evgueni Filatov, Capes Shipping Services Inc., River-Sea Shipmanagement Ltd. and EI Holdings Ltd. This lawsuit has been filed in Malta on the 18th of February, 1999: writ of Summons Number 411/99/GV.

1. Due to the fact that court fees in Malta had been increased two and a half times since the beginning of this case and because we were not able to locate assets of Filatov and/or his relatives in Malta we decided to restrict our claim to the sum of about USA\$ 1000000. Having enough evidence material for Filatov's own misappropriations reaching the amount of USA\$ 1000000 we decided to waive the claims against his family members and relatives, although we have documentary materials confirming the allegation that they personally benefited from the funds that belonged to the group of companies. We reserve our right to prosecute this claim at any time in the future, but not for the time being.
2. I refer to paragraph 68 of my first affidavit wherein I stated that the plaintiff's claim in the lawsuit is quantified at USA\$1,054, 656. I have been instructed by my lawyer to breakdown of plaintiff's claim in order for the court to have a clear picture of the amounts claimed from each of the respective defendants. The amounts indicated below represent the total sums unlawfully received by the defendant companies and by third parties.

▪ E.I. Holdings unlawfully received the amount of	USA\$ 591391
▪ J & M Parnis England (not a defendant)	USA\$ 32000
▪ River-Sea Shipmanagement Ltd unlawfully received	USA\$ 62265
▪ Stanislav Filatov (personally) unlawfully received	USA\$ 48000
▪ Capes unlawfully received	USA\$ 11,000
▪ River-Sea Ltd unlawfully received	USA\$ 310000
TOTAL	USA\$ 1054656

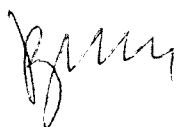
3. I we incurred various expenses during the investigations I carried out to determine the illegal actions of Filatov and his whereabouts. These expenses included:
 - The fees paid to Clyde & Co. Solicitors of Guildford, U.K.
 - The fees paid to GM Ganado & Associates of Valletta, Malta
 - The fees paid to private investigators in USA
 - The fees paid to Hill Rivkins (law firm) of New York, in USA

¹ Hereinafter referred to together as the "Maltese Plaintiff Companies".

Due to reasons stated above we decided to restrict our claim within USA\$ 1054767 and abstain from claiming the fees that we paid to our lawyers and consultants during the progress of this case.

4. Plaintiffs in the said lawsuit are asking the Court to order that the above defendants return to them the money each of the defendants received through Mr. Filatov's illegal actions. Failing that, it should be Filatov who ought to be condemned by the court to refund the whole amount. Plaintiffs request the Court to provide for this "fallback" option in its judgement. We maintain this view because it was Mr. Filatov who misappropriated these sums it should be Filatov who is ordered by the Court to refund those sums to the plaintiffs particularly if those who benefited fail (for any reason) to refund those sums themselves.
5. We are requesting this because plaintiffs have serious doubts whether for example the defendant companies River-Sea Shipmanagement and E.I. Holdings have any assets. These companies are both in liquidation. The chances for recovery from Capes Shipping Inc. are also look bleak. That is why we request the Maltese court to condemn Filatov to refund us the whole amount if those entities that benefited from his illegal actions do not reimburse us themselves the amount they respectively received.
6. Finally, I want to explain to the Court that the bank statements I obtained from Hambros Bank which I attached to my first affidavit, were obtained with the assistance and intervention of a law firm called Clyde & Co. based in London. Mr. David Bennet was the lawyer from that firm who personally assisted me in contacting Hambros bank Ltd (then in process of acquisition by Societe Generale). We paid for the services of Societe Generale related to providing is with statements of accounts of Kama Malta Shipping Co. Ltd. and Kama II Shipping Co. Ltd. \$ 3000 through our lawyers Clyde & Co. I attach to the present affidavit evidential materials:
 - letter of Clyde & Co # DPB/0211023 - copy
 - letter of Clyde & Co DPB/CMK/9705567 - copy
 - interim account of Clyde & Co. DPB/CMK/9705567 dd. 08.12.99- copy,
 - interim account of Clyde & Co. DPB/CMK/9705567 dd. 18.12.98- copy,
 - narrative report regarding time spend for servicing the plaintiff companies from 04.09.98 till 11.12.98- copy
 - Letter of Clyde & Co dd. 18.12.98 ,
 - Invoice # 014/99 of Societe Generale for procuring copies and advices for Kama II Shipping Co. Ltd. And Kama Malta Shipping Co. Ltd. - copy
7. All the mentioned transfers made by Mr. S Filatov indicated in my affidavits were unauthorised by plaintiffs and by the shareholders of the plaintiff companies. When the shareholders of the plaintiff companies became aware of these transactions they refused to ratify these payments because it was evident that they were effected for purposes not related to the ordinary business of the plaintiff companies and to the detriment of the plaintiff companies. At no point did the Maltese plaintiff Companies or

Version 3, 18.11.02



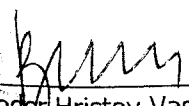
AFFIDAVIT

its shareholders permit Mr. Filatov to behave in this way. He had no right to transfer sums to himself, his companies or his family members. The transfers in question did not relate to the business of the Maltese plaintiff Companies. Mr. Stanislav Filatov abused of the position of trust (his directorship) in the Maltese plaintiff companies. We request the Maltese Courts to acknowledge this and to order Mr. Filatov and or the other defendants to refund the money misappropriated by Mr.

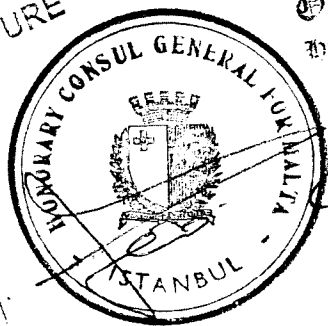
8. I deem it necessary to explain to the court the relationship between Mr. Filatov and the companies to which he transferred funds belonging to the group of Maltese companies.

- Stanislav Filatov was in fact the beneficial shareholder of River-Sea Shipmanagement Ltd, EI Holdings Ltd and River Sea Ltd. These three companies shared the premises of the plaintiff Maltese companies on 60, South Str, Valletta, Malta and their business was transacted from there. Filatov was the only person signing documents on behalf of those three companies. We used to have a secretary Mrs. Audrey Arrigo (at that time Cefai) who was attending the business of those three companies together with the business of the plaintiff companies.
- It is also important for the court to know the relationship between Mr. Filatov and Capes Shipping Inc. of USA. In 1996 Mr. Filatov and his family obtained a green card for living and working in USA. Same year he settled in Norfolk, Virginia and advised us that he was working for this company. We usually were able to contact Mr. Filatov at the telephones/faxes of Capes Shipping Inc. about 10-11 hrs Local time (16-17 hrs Maltese time). Upon my best knowledge no contract of whatsoever nature existed between the plaintiff Maltese companies and Capes Shipping Inc.

Signed this 19th day of November 2002 in Istanbul, Turkey


Todor Hristov Vassilev

CERTIFIED TRUE
SIGNATURE



Oguz Teoman
Hon. Consul General

19 NOV 2002

CLYDE&CO

Beaufort House Chertsey Street Guildford Surrey GU1 4HA
Telephone: +44 (0) 1483 55 55 55 | Facsimile: +44 (0) 1483 56 73 30 | DX: 2406 Guildford
Website: www.clydeco.com

NATIONAL LAW FIRM LONDON GUILDFORD CARDIFF PARIS BELGRADE PIRAEUS ST. PETERSBURG DUBAI SINGAPORE HONG KONG CARACAS

FAX TRANSMISSION

To Vassilev Maritime, Istanbul, Turkey
Fax no + 90 216 459 68 30 or 35
Attn Todor Vassilev, Esq.
Your ref
Date 19 November 2002

Our ref DPB/0211023
Total pages (including cover) 9

Dear Todor,

M/V "ANNA JOHN"

As requested, I attach copies of our invoices dated 18th December 1998 and 8th December 1999 for £3,259.60 and £2,833.38 respectively. I also attach a copy of the invoice from Societe Generale for US \$3,000.

Please be aware that our invoice of 18th December 1998 did not relate solely to obtaining the documents from Hambros. It also covered the time spent seeking to follow-up the Hull proceeds. I have, therefore, attached a narrative indicating how the time was spent.

I regret that the courier from Ganado & Associates has not yet arrived. This is holding up the preparation of my Affidavit. Hopefully, however, it will arrive some time today.

Kind regards,

David Bennet

David Bennet
CLYDE & CO

NOT RECEIVED THE TOTAL NUMBER OF PAGES OR NEED ASSISTANCE, PLEASE CALL +44 (0) 1483 55 55 55
CONFIDENTIALITY NOTICE

For the documents accompanying it may be privileged and confidential and exempt from disclosure under applicable law. If you are not the intended recipient, or the employee or agent responsible for delivering it to the intended recipient, you should not disclose, copy, distribute or disseminate it. If you have received our facsimile (or any copy) in error, please notify us by telephone on +44 (0) 1483 55 55 55 and return this facsimile and any copies to us as soon as possible. Thank you. Clyde & Co is an international partnership of solicitors and registered foreign lawyers. A list of partners' names is available on request. Regulated by the Law Society

COPY

CLYDE & CO

Beaufort House Chertsey Street
Guildford Surrey GU1 4HA
Telephone | 01483 55 55 55
Facsimile | 01483 56 73 30
DX | 2406 Guildford
E-mail | info@clyde.co.uk
Website | www.clydeco.com

Hristov Todor Vassilev
Kama II Shipping Co Ltd
Nihat Kiziltan Sokak
Kismet Apt 7/9
Saskinbakkal
Radikoy
Istanbul

Our ref
DPB/CMK/9705567

Your ref

Date
8th December 1999


Dear Mr Vassilev

M/V "ANNA JOHN" - Kama II Shipping Co Ltd

I have pleasure in enclosing our invoice to cover the further work done in this matter over the last twelve months. This includes time spent finalising matters with Simon Day of Hambros Bank, liaising with Dr. Jotham Scerri-Diacono and in discussing the case with those instructed on your behalf such as the companies considered to perform asset-tracing services.

We look forward to receiving your remittance in due course.

Yours sincerely


Margaret Kelly
Clyde & Co

Enc.

184090.01

INTERNATIONAL LAW FIRM LONDON GUILDFORD CARDIFF HONG KONG SINGAPORE DUBAI CARACAS PARIS PIRAEUS ST. PETERSBURG
A list of partners' names is available on request. Authorised by the Law Society under the Financial Services Act 1986

1
A
184090.01

At Shipping Co Ltd
at Kiziltan Sokak
met Apt 7/9
skinbakkal
ilkoy
stanbul
my Ref: Todor Vassilev

CLYDE & CO

AN INTERNATIONAL LAW FIRM

Beaufort House, Chertsey Street,
Guildford GU1 4HA.
Telephone: 01483 55 55 55 Telex: 8594777 Clyde G
Facsimile: 01483 56 73 30
DX: 2406 Guildford

VAT Registration No: GB 243 2064 96

Our Ref: DPB /CMK /9705567

date. 8 December 1999

Client Account

VAT
%

"Anna John"

Invoice Period 16/12/98 - 07/12/99

to Professional Fees

690.50 0.00

Disbursements

73.80 0.00

Courier Fees

114.47 0.00

Postage, Telecommunication charges & Photostat Documents

1,954.61 0.00

Incidental Expenses (including payment to Hambros Bank)

Fees and Disbursements

STG 2,833.38

-1,820.94

LESS: Monies received on account

Balance Due STG 1,012.44

Clyde & Co

This is outside the scope of UK VAT

* Indicates the amount is unpaid.

II Shipping Co Ltd
at Kiziltan Sokak
met Apt 7/9
Kimbakkal
ikoy
anbul
Ref: Todor Vassilev

CLYDE & CO

AN INTERNATIONAL LAW FIRM

Beaufort House, Chertsey Street,
Guildford GU1 4HA.
Telephone: 01483 55 55 55 Telex: 8594777 Clyde G
Facsimile: 01483 56 73 30
DX: 2406 Guildford

VAT Registration No: GB 243 2064 96

Dec 8 December 1999

Our Ref: DPB /CMK /9705567

Prerim Account

ees and Disbursements on Invoice No. 474273	2,833.38
ESS: Monies received on account	-1,820.94
Balance Due STG	<u>1,012.44</u>

***** REMITTANCE ADVICE *****

Payment Instructions:

Payment is now due and may be made by cheque to Clyde & Co.
or by Telegraphic Transfer quoting reference DPB /CMK /9705567
and Invoice No.474273 to our Office Account No. 13569740

National Westminster Bank PLC
City Of London Office
Box 12258
Princes Street
London EC2R 8PA
Sort Code 60-00-01

NEW /B3
Rights appear overleaf.

* Indicates the amount is unpaid.

Regulated by the Law Society under the Financial Services Act 1986

7

TA

INVOICE NO. 462130

Kama Shipping Co Ltd
Nihat Kiziltan Sokak
Nispet Apt 7/9
Maskebakkal
Kadikoy
Istanbul

CLYDE & Co

AN INTERNATIONAL LAW FIRM

Beaufort House, Chertsey Street,
Guildford GU1 4HA.
Telephone: 01483 55 55 55 Telex: 8594777 Clyde G
Facsimile: 01483 56 73 30
DX: 2406 Guildford

VAT Registration No: GB 243 2064 96

Date: 18 December 1998

Our Ref: DPB /CMK /9705567

Interim Account:

VAT
%

"Anna John"

Invoice Period 04/09/98 - 11/12/98

To Professional Fees as per the
attached narrative.

3,202.40 .00

Disbursements

Postage, Telecommunication Charges,
Photostat Documents & Incidentals

57.20 0.00

Fees and Disbursements

£ 3,259.60

LESS: Monies Received On Account

-3,259.60

Balance Due £ 0.00

***** FILE COPY *****

This is outside the scope of UK VAT
ASW /B1

Size of Rights appear overlaid.

* Indicates the amount is unpaid.

Regulated by the Law Society under the Financial Services Act 1986

Shipping Co Ltd
 John"
 Ref: DPB /CMK /9705567

CLYDE & CO
 AN INTERNATIONAL LAW FIRM

Professional Services rendered in the caption matter as follows :

		Hrs. (Units)
CMK - Margaret Kelly	- Partner	1.70
DPB - David Bennet	- Snr. Assistant.	14.80
	Total	16.50

Date	Chlr	Hours	Narrative
09/98	DPB	0.10	Drafting document - fax out.
09/98	DPB	0.10	Internal meeting - CMK discussion.
09/98	DPB	0.40	Analyse document - reviewing 33 page fax from clients.
09/98	CMK	0.10	Ongoing attention
09/98	DPB	0.50	Drafting document - fax out.
09/98	CMK	0.10	Approving fax advice to clients
10/98	DPB	0.50	Drafting document - case management.
10/98	CMK	0.10	Discuss with DPB
10/98	DPB	0.10	Analyse document - fax in from client.
10/98	DPB	0.30	Drafting document - dictating response to fax.
10/98	DPB	0.10	Internal meeting - CMK discussion.
10/98	CMK	0.10	Telecon in Mr Vassilev
10/98	CMK	0.10	Fax from Mr Vassilev
10/98	DPB	0.10	Drafting document - fax out.
10/98	DPB	0.10	Analyse document - fax in.
10/98	DPB	0.20	Phone call to client.
10/98	DPB	0.60	Phone call - Hambros to fix meeting.
10/98	DPB	0.40	Drafting document - letter of invitation and fax out.
10/98	DPB	0.20	Phone call with Mr Vassilev.
10/98	CMK	0.20	TCI Jotham Scierri Diacono
10/98	CMK	0.10	Need to action telecon Jotham Scierri Diacono
11/98	CMK	0.20	Action request Jotham Scierri Diacono
11/98	CMK	0.10	Fax from Ganado
11/98	DPB	0.10	Analyse document - fax in from Ganado & Partners.
11/98	DPB	0.10	Phone call with Hambros Bank.
11/98	DPB	0.30	Drafting document - urgent fax out.
11/98	DPB	0.30	Phone call with Hambros Bank.
11/98	DPB	0.40	Analyse document - Fax in from Maltese lawyers.
11/98	DPB	0.40	Phone call with client.
11/98	CMK	0.10	Incoming fax
11/98	DPB	0.10	Analyse document - Faxes in.
11/98	DPB	0.20	Drafting document - Further fax to Hambros Bank.
11/98	DPB	0.10	Drafting document - faxes out.
11/98	DPB	0.20	Analyse document - faxes in.
11/98	CMK	0.10	Status generally
11/98	DPB	0.10	Drafting document - fax to client.
11/98	DPB	0.10	Phone call with Hambros.
11/98	DPB	0.10	Drafting document - dictating fax to client.
11/98	DPB	0.30	Phone call with client and phone call with Hambros.
11/98	DPB	0.10	Drafting document - fax out to client.
11/98	DPB	0.10	Faxes in

Shipping Co Ltd

John"

Ref: DPB /CMK /9705567

CLYDE & CO
AN INTERNATIONAL LAW FIRM

Date	Chlr	Hours	Narrative
12/98	DPB	0.10	Telecon Hambros
12/98	DPB	3.00	Preparing for and meeting Mr. Vassilev and then Simon Day of Hambros
12/98	DPB	0.20	Telecons client
12/98	DPB	0.30	Urgent fax to Black Sea - Telecons Hambros
12/98	DPB	1.10	Phone calls with Mr Vassilev, SD and JD.
12/98	DPB	0.10	Drafting document - Fax to Hambros.
12/98	DPB	0.10	Analyse document - fax in.
12/98	DPB	0.20	Phone call with Mr Vassilev
12/98	DPB	0.20	Drafting document - fax out.
12/98	DPB	0.10	Phone calls with Mr Vassilev and SD.
12/98	DPB	0.20	Phone calls with SD and TV.
12/98	CMK	0.20	Meeting Jotham Scierri Diacono in Guildford with DPB
12/98	DPB	2.50	Meeting with JSD and phone call with Mr Vassilev.
12/98	CMK	0.20	Ongoing aspects

16.50

NEA

7

UL

AD
TAL
7

COPY

Kama Shipping Co Ltd
Nihat Kiziltan Sokak
Kismet Apt 7/9
Saskinbakkal
Kadikoy
Istanbul

FAO. Hristov Todor Vassilev

18 DEC 1998

DPB/CMK/9705567

Dear Sir

"ANNA JOHN"

We enclose our interim invoice for the work done up to 11th December 1998. As you are aware, our fees are slightly in excess of the figure stated in the attached invoice but for convenience we have matched our fees with the amount of money held on account and shall carry the small balance forward against our next invoice.

There is no need for you to send any funds in settlement of the attached invoice since, as you will note, it is covered by the money we are holding on account of fees. We do look forward, however, to receiving the money on account requested in our fax of 14th December 1998.

Yours very truly,

Clyde & Co

Enc.

100931.01

Clyde & Co.
Beaufort House
Chertsey Street
Guildford
Surrey GU1 4HA

Attention: Mr. David Bennet

Date of invoice (Tax Point): 15 January 1999

Invoice Number 014/99

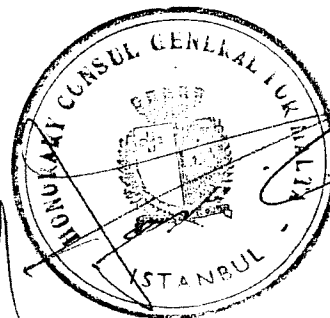
Description	£ (USD)
1. Kama II Shipping Co. Ltd 2. Kama Malta Shipping Co. Ltd	
Fee for producing copy statements and advices for the above companies.	3,000.00
Total	(USD) \$ 3,000.00

Please quote our invoice number when making payment

Payment due by cheque or bankers payment to:
SOCIETE GENERALE, Accounts Payable Dept
Exchange House, Primrose Street
London EC2A 2HT

Or by direct transfer to:
SOCIETE GENERALE
SORT CODE NO. 20 - 63 - 91
ACCOUNT NO. 9913401

Vat No. 629 2807 22



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